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Environment Agency

Richard Hart Gravesham Borough Council		**Our ref:** **Your ref:**	PA-0005131/01 20260521
Sent by email		**Date:**	14 July 2026

Dear Richard

Application for approval of condition 2, 5, 8, 9, 11 and 12 attached to planning permission reference number 20250721 relating to full details of the road improvements works at the Canal Road / Chequers Street / Church Street /Lower Rochester Road junction (2), full details of the phasing of the development (5), a comprehensive Demolition and Construction Logistics Plan covering all environmental impacts (8), a full Construction Traffic Management Plan (9), an updated preliminary ecological appraisal and review and of the site wide mitigation strategy (11) and a strategy to deal with the potential risks associated with any contamination of the site or the relevant phase (12).

Nuralite Industrial Estate, Canal Road, Higham, Rochester Kent

Thank you for consulting us on the above application which we received on 28 May 2026. As part of this consultation, we have reviewed the following documents:

- Demolition and Construction Logistics Plan, ref. RSK/MA/663970-01(00), dated 7 May 2026, by RSK
- Remediation Options Appraisal and Method Statement, ref. 253249-R01(01), dated October 2025, by RSK Geosciences
- Sequence Plan, ref. T24-0792, by Erith
- Preliminary Ecological Appraisal, ref. J25-000204, dated 8 September 2025, by Greenspace Ecological Solutions

Environment Agency position
We **object** to the discharge of condition 11.
We have **no objection** to the discharge of conditions 8 and 12.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome our objection(s)
- Section 2: Other technical comments
- Section 3: Advice to the Applicant

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Gabrielle Delorme
Sustainable Places Planning Specialist
E-mail kslplanning@environment-agency.gov.uk

Section 1: Reasons for, and how to overcome, our objection(s)

Condition 11 (Ecological appraisal and mitigation strategy)

Having reviewed the submitted Preliminary Ecological Appraisal (PEA) and site wide mitigation strategy, we note that the PEA does not mention the possible ecological receptors within the adjacent canal to which a dredge is proposed.

We recommend an updated mitigation strategy to ensure that fisheries' concerns and mitigation measures are addressed for the canal.
At present without this information, we are unable to recommend the discharge condition 11.

Section 2: Other technical comments

Please note that we have no comments to make on the other conditions subject to this application (conditions 2, 5 and 9) as they were not requested by us.

Condition 8 (Demolition and Construction Logistics Plan)

The submitted Construction Environment Plan includes appropriate waste and dust management measures. We are therefore satisfied that condition 8 can be discharged.

Condition 12 (Land contamination)

Having reviewed the submitted Remediation Options Appraisal and Method Statement, the Sequence Plan, and Demolition & Construction Logistic Plan. We have no objection to the discharge of condition 12 from a site contamination protection perspective.

We are generally not in a position to visit the site and verify any works undertaken; therefore, the above comments are based solely on the submitted documents and reported actions and no responsibility can be taken for the accuracy of any information submitted.

Section 3: Advice to the Applicant

Planning advice service

Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service, we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £119.37 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available here.

If you would like more information on our planning advice service, including a cost estimate, please contact us at kslplanning@environment-agency.gov.uk